

**Release Notification Form &  
Permanent Solution Statement  
with No Conditions**

**Stavis Seafoods, Inc.  
7 Channel Street  
South Boston, Massachusetts**

**RTN 3-33439**

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*Prepared for:  
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## 1.0 INTRODUCTION

Knowles Enterprises, LLC. (Knowles Enterprises) has prepared this *Release Notification Form & Permanent Solution Statement with No Conditions (Appendix A)* on behalf of Stavix Seafoods, Inc., in accordance with the Massachusetts Contingency Plan (MCP) (310 CMR 40.0000) for a release (the Release) which occurred at the property located at 7 Channel Street in South Boston, Massachusetts (the Subject Property), as shown in Figure 1 and Figure 2. A release of an estimated maximum of 2,169 pounds of Anhydrous Ammonia to the atmosphere and a release less than 10 gallons of hydraulic occurred on March 23, 2016 at approximately 5:50 PM, within the mechanical room located on the second floor of the building shown on Figure 1. The Release was reported to the Massachusetts Department of Environmental Protection (MassDEP) at 6:30 PM on March 23, 2016, within two hours of the Release; Release Tracking Number (RTN) 3-33439 was assigned to the Release. Emergency response personnel were able to locate the shut off valve stopping the release of anhydrous ammonia. On the date of release, March 23, 2016, Clean Harbors, Inc. applied absorbents to the mechanical room to capture any free liquids in puddles on the floor. As a result of the application of absorbents, 5 drums of oily solids were disposed of under Uniform Hazardous Waste Manifest (009083243FLE) (Appendix B). On April 1, 2016, the Potentially Responsible Party (PRP), Stavix Seafoods, Inc., retained Tanner Industries, Inc., to evacuate the remaining 3,231 pounds of anhydrous ammonia from the chiller system. A copy of a letter indicating proper disposal is provided in Appendix B. Based on the description of the release, provided by Mr. Scott Sweet, which indicated that all of the released anhydrous ammonia was evacuated upon release from the mechanical room, to the open atmosphere by the automated ventilation system. The released hydraulic oil was sprayed on equipment within the mechanical room and was not observed to enter the floor drain of the mechanical room at any point during or after the release.

Based on the results of observations, wherein it is evident that the 2,169 pounds of anhydrous ammonia that was released was evacuated to the atmosphere and did not result in any measurable impact to the environment after vaporization and the released hydraulic oil was retained within the mechanical room and collected with absorbents and additional decontamination of equipment, a condition of No Significant Risk has been achieved regarding the Release and a Permanent Solution with No Conditions has been achieved. Therefore, a Permanent Solution Statement with no conditions is being submitted for this Release. The Bureau of Waste Site Cleanup *Permanent & Temporary Solution Statement* (BWSC-104) and *Release Notification & Retraction Form* (BWSC 103) were electronically submitted to MassDEP. The receipt for the electronic submittals and copies of these forms are included as Appendix A.

## **2.0 CONCEPTUAL SITE MODEL**

The Release occurred when a steel pipe failed on a chiller releasing what was estimated to be 2,169 pounds anhydrous ammonia and less than 10 gallons of hydraulic oil within the chiller room of Stavis Seafoods, Inc. The released anhydrous ammonia triggered the chiller room ventilation system to evacuate the atmosphere of the room drawing in fresh air. Stavis Seafoods, Inc. personnel and the fire department responded to the release and shut the chiller off and closed the anhydrous ammonia feed valve stopping the release. Tanner Industries, Inc., removed 3,231 pounds of anhydrous ammonia remaining in the system and disposed of it as indicated in the letter provided in Appendix B.

Initial response actions consisted of stopping the release of anhydrous ammonia by shutting the supply line valve. Decontamination of equipment within the chiller room, performed by Clean Harbors, Inc. within recovery of spent sorbents and recovery and disposal of spent rinse water has returned the conditions of the mechanical room to those consistent with background consistent with 310 CMR 40.1020. As a result of achieving background conditions a condition of No Significant Risk harm to health safety, public welfare and the environment at Disposal Site in accordance with 310 CMR 40.0900.

## **3.0 DISPOSAL SITE AND SURROUNDING AREA CHARACTERISTICS**

The Disposal Site Boundaries have been selected based on locations that visual observations have indicated were impacted by the Release of anhydrous ammonia and less than 10 gallons of hydraulic oil identified by RTN 3-33439. The area within the Disposal Site Boundaries is referred to as “the Disposal Site” within this report. The Disposal Site Boundaries, shown on Figure 1, are located within the property boundaries of 7 Channel Street, South Boston, Massachusetts. According to the City of Boston online Property Record Card the property is 74,203 square feet and is observed to be developed with a 2 story building that houses mechanical equipment for the chiller system.

The elevation of the Disposal Site is approximately 25 feet above sea level. The ground surface within the Disposal Site Boundary is covered with concrete and is relatively flat. The general area outside the Disposal Site Boundary slopes to the north towards Boston Harbor. The Universal Transverse Mercator (UTM) Coordinates for the Disposal Site are 238,078.57 north and 899,566.53 east. As indicated on Figure 2, the Site is surrounded by mixed commercial and residential use.

## **4.0 DISPOSAL SITE HISTORY**

The Subject Property where the Release occurred is occupied by Stavis Seafoods, Inc. which operates as a wholesale distributor service for fish. The history of the property is unknown however it appears to have been used historically for commercial/industrial purposes.

### **4.1 OIL AND/OR HAZARDOUS MATERIAL USE AND STORAGE HISTORY**

The location where the Release occurred is within the second floor of the building, and the Release was limited to gaseous anhydrous ammonia that was evacuated to the atmosphere and sprayed hydraulic oil that was retained within the room, therefore, an in depth investigation of the use of OHMs and storage history for the entire Subject Property was not conducted.

## **5.0 RESPONSE ACTIONS**

Response actions were limited to the closing of a valve to the anhydrous ammonia tanks eliminating the release, recovery of excess hydraulic fluid with absorbents and decontamination of the equipment of the mechanical room. A description of these activities, including MCP reporting, and a summary of the data obtained from these activities is provided in the following section.

### **5.1 MCP REPORTING**

No prior reports have been submitted to the MassDEP for this Release. In accordance with 310 CMR 40.0420(8), which states an Immediate Response Action (IRA) Plan is not required if a Permanent Solution Statement is received by the due date of the IRA Plan, no written IRA Plan has been submitted because this Permanent Solution Statement is being submitted prior to the 60 day due date of the IRA Plan. All response actions were conducted under emergency response and no additional approvals were issued by the MassDEP. Similarly, in accordance with 40.0427(3), which states that an IRA Completion Report shall not be required for sites where a Permanent Solution Statement is submitted within 120 days of first informing the MassDEP of the need to conduct an IRA at the site, no IRA Completion Report has been submitted because this *Release Notification Form & Permanent Solution Statement with No Conditions* has been submitted within 120 days of first informing the MassDEP of the need to conduct an IRA at the Site. The conditions which gave rise to the need for an IRA as described in 310 CMR 40.0412 have been remediated to a degree which will ensure the accomplishment of any necessary stabilization of site conditions. Site conditions do not require the operation and maintenance of any Active Remedial Systems or Active

Exposure Pathway Mitigation Measures or incorporation of ongoing response actions to eliminate or control any Imminent Hazard conditions. No Critical Exposure Pathways were identified as a result of the Release.

## **5.2 RELEASE HISTORY**

The Release occurred when a steel pipe failed on a chiller releasing what was estimated to be 2,169 pounds anhydrous ammonia and less than 10 gallons of hydraulic oil within the chiller room of Stavis Seafoods, Inc. The released anhydrous ammonia triggered the chiller room ventilation system to evacuate the atmosphere of the room drawing in fresh air. Stavis Seafoods, Inc. personnel and the fire department responded to the release and shut the chiller off and closed the anhydrous ammonia feed valve stopping the release. Tanner Industries, Inc., removed 3,231 pounds of anhydrous ammonia remaining in the system and disposed of it as indicated in the letter provided in Appendix B. Based on the nature of the release and observation of no free product entering the drain within the mechanical room, the disposal site is limited mechanical room of the Site as indicated on Figure 1.

## **5.3 METHODOLOGIES**

No remediation activities were completed as part of the response. Anhydrous Ammonia was released in vapor form to the inside of the mechanical room and evacuated to the atmosphere. Free liquid was recovered with absorbent material and equipment within the mechanical room was decontaminated and the rinse water recovered.

## **5.4 FIELD DATA REVIEW**

Field data was limited to visual observations made and verbal reporting provided by Mr. Scott Sweet of HCG Associates on the date of Site inspection May 17, 2016. Based on visual observations the equipment has been decontaminated and no free flowing liquids were present on the floor. In addition it was reported by Mr. Sweet that no free flowing liquids entered the floor drain in the room and there was also no visual impact to the drain outside the building at the time of release. There was no visual impact within the drain line of the mechanical room or in the outside drain on the date of inspection May 17, 2016.

## **5.5 REMEDIATION WASTE**

3,231 pounds of anhydrous ammonia remaining in the system was removed from the system on April 1, 2016. 500-gallons of decontamination water generated as part of the decontamination procedures from Boston Fire Department was removed on April 4, 2016. An additional 750 gallons of waste water was removed on April 28, 2016 as part of remaining anhydrous ammonia blow off performed by Tanner Industries, On April 1, 2016. 5 drums of oil solids and 3 drums of oily liquids generated by Clean Harbors, Inc. as part of equipment decontamination. All manifests are provided as Appendix B.

## **5.6 PERMITS & APPROVALS**

Initially verbal approval was granted by MassDEP Northeast Regional Office (NERO). The initial IRA Plan approval included the removal of decontamination water generated by Boston Fire Department, decontamination, removal of remaining anhydrous ammonia and removal of solids and water from equipment decontamination.

## **6.0 RISK CHARACTERIZATION**

The risk of harm to health, safety, public welfare and the environment, with respect to the residual lubricating oil remaining at the Disposal Site has been characterized. Consistent with 310 CMR 40.0901(3) The characterization of risk of harm to health, safety, public welfare, and the environment is not required for a disposal site, environmental medium, or chemical for which response actions have successfully reduced concentrations to background levels, as described in 310 CMR 40.1020.

## **7.0 PERMANENT SOLUTION STATEMENT WITH NO CONDITIONS**

A Permanent Solution with No Conditions, as described in 310 CMR 40.1041(1), has been achieved for the Site located at 7 Channel Street, South Boston, Massachusetts and identified by RTN 3-33439. All Source of OHM Contamination have been eliminated and the level of OHM concentrations in the environment are consistent with Background levels. The Permanent Solution applies to the entire Disposal Site which is shown on Figure 1 and is described as an area within the second floor of the building at the Subject Property. This *Release Notification Form & Permanent Solution Statement with No Conditions* is not based upon the implementation of any Activity and Use Limitations (AULs), the effective operation of any Active Exposure Pathway Mitigation



Measures, or any assumptions about the current or future site activities, uses, or conditions that do not require and AUL. Concentrations of OHMs remaining at the Site do not exceed one or more applicable UCLs. No other Permanent or Temporary Solution Statements have been filed for the disposal site. No operations, maintenance, and/or monitoring is required to confirm and/or maintain the conditions at the disposal site upon which the Permanent Solution Statement with No Conditions is based. It is the Opinion of Mr. Scott Kraihanzel, the LSP of record for the disposal site, that the requirements of a Permanent Solution with No Conditions have been met for RTN 3-33439.

## **7.1 AREA OF PERMANENT SOLUTION**

The Permanent Solution applies to the entire Disposal Site identified by RTN 3-33439 and located at 7 Channel Street, South Boston, Massachusetts (238,078.57 north and 899,566.53 east). The boundaries of the disposal site, as well as the boundaries of the area of the Permanent Solution, consists of the point of release of Anhydrous Ammonia (<0.02acres, located in the northwest corner of building at the Subject Property as shown on Figure 1.

## **7.2 SOURCE ELIMINATION OR CONTROL**

All sources of OHM Contamination have been eliminated or controlled, as specified in 310 CMR 40.1003(5)(a) and (b). All unpermitted releases to the environment have been eliminated and all sources of OHM contamination have been eliminated. No leaking storage tanks, vessels, drums, or other containers; no dry wells or wastewater disposal systems that are not in compliance with regulations governing discharges from those systems; and no waste deposits, sludges, or impacted soil, sediment or bedrock at or near a point of discharge or deposit of OHM into the environment containing sorbed OHM or NAPL that is contaminating surrounding environmental media via dissolution or volatilization processes exist at the Site.

## **7.3 MIGRATION CONTROL**

Response actions have been taken to adequately assess and control the migration of OHMs remaining at the disposal site as specified in 310 CMR 40.1003(6)(a).

## **7.4 NAPL MOBILITY CONTROL**

No NAPL was released to the environment as part of the release under RTN 3-33439

## **7.5 FEASIBILITY OF ACHIEVING OR APPROACHING BACKGROUND**

The MCP defines background to mean those levels of oil and hazardous material that would exist in the absence of the disposal site including both Natural Background and Anthropogenic Background.

In regards to the Release identified by RTN 3-33439, based on the nature of the release and decontamination activities of equipment within the mechanical room background has been achieved.

## **7.6 ON-GOING ACTIVITIES**

The Permanent Solution Statement with No Conditions is not contingent upon operations, maintenance, and/or monitoring to confirm and/or maintain the conditions at the disposal site. No remediation waste remains at the Site or neighboring parcels from the remedial activities relative to RTN 3-33439.

## **7.7 REPRESENTATIVENESS EVALUATION AND DATA USABILITY ASSESSMENT**

The Representativeness Evaluations & Data Usability Assessment (REDUA) section of this *Release Notification Form & Permanent Solution Statement with No Conditions* is intended to document and support the conclusion of the Permanent Solution Statement with No Conditions as required by 310 CMR 40.1056(2)(k) and incorporate guidance provided in MassDEP Policy WSC-07-350. REDUA provides an evaluation and demonstration of the adequacy of the spatial and temporal data set used to support the Permanent Solution Statement with No Conditions and makes conclusions on the accuracy, precision and sensitivity of the data on which the achievement of a condition of No Significant Risk is based.

### **7.7.1 Field Screening**

Visual and olfactory observations were used to determine potential impacts to surfaces in the chiller room.

### **7.7.2 Sampling Locations**

It is the opinion of Knowles Enterprises that visual inspection of the equipment surfaces within the mechanical room have been collected to substantiate the achievement of a condition of a No Significant Risk and a Permanent Solution at the Site.

### **7.7.3 Temporal Data**

The data relied upon to evaluate the risk of harm to human health, safety, public welfare, and the environment from the potential impact remaining at the Disposal Site was from the visual observations of surfaces in order to ensure that conditions representative of current site conditions were utilized for the Risk Characterization. Based on the nature of the release, it is the opinion of Knowles Enterprises that field observations have been conducted at a sufficient frequency to conservatively evaluate the risk of harm to human health, safety, public welfare, and the environment posed by current and foreseeable Site conditions created by the Release.

### **7.7.4 Field Completeness**

An appropriate amount of assessment has been completed at the Site. Visual and olfactory inspection of the mechanical room indicated the anhydrous ammonia release did not impact meltwater or surfaces. The visual observations made and site conditions reported at the time of release are sufficient to support a condition of No Significant Risk.

### **7.7.5 Data Inconsistency**

No inconsistencies in data were noted during the response actions completed at this Site.

### **7.7.6 Data Not Used**

All visual and olfactory observations and data were utilized to substantiate the achievement of a condition of No Significant Risk, and a Permanent Solution.

### **7.7.7 Laboratory Analytical Data Usability**

No laboratory analytical data was used in the determination of No Significant Risk as a result of field data and nature of the release.

## **7.8 PERMANENT SOLUTION STATEMENT SUBMITTAL FEE**

Because this Release Notification Form & Permanent Solution Statement with No Conditions is being submitted within 120 days of release notification, no fee is required for submittal of Permanent Solution Statement with No Conditions.

## 8.0 CONCLUSIONS

The Release occurred when a steel pipe failed on a chiller releasing what was estimated to be 2,169 pounds anhydrous ammonia and less than 10 gallons of hydraulic oil within the chiller room of Stavis Seafoods, Inc. The released anhydrous ammonia triggered the chiller room ventilation system to evacuate the atmosphere of the room drawing in fresh air. Stavis Seafoods, Inc. personnel and the fire department responded to the release and shut the chiller off and closed the anhydrous ammonia feed valve stopping the release. Tanner Industries, Inc., removed 3,231 pounds of anhydrous ammonia remaining in the system and disposed of it as indicated in the letter provided in Appendix B. Based on the description of the release, provided by Mr. Scott Sweet, which indicated that all of the released anhydrous ammonia was evacuated upon release from the chiller room, to the open atmosphere by the automated ventilation system and the remaining surfaces impacted by sprayed hydraulic oil were decontaminated with absorbents and rinse water. The level of oil and hazardous material in the environment is documented as being reduced to background, and a Permanent Solution have been achieved at the Site without the implementation of any institutional controls or property restrictions. A Permanent Solution Statement with No Conditions, as described in 310 CMR 40.1041(1), has been achieved for the Site located at 7 Channel Street, South Boston, Massachusetts and identified by RTN 3-33439. No operations, maintenance, and/or monitoring is required to confirm and/or maintain the conditions at the disposal site upon which the Permanent Solution Statement with No Conditions is based.

## 9.0 PUBLIC INVOLVEMENT

Public Involvement activities have been conducted in accordance with 310 CMR 40.1403. These activities included notifying the City of Boston Chief Municipal Officer (CMO) and the Chief Health Official (CHO) of the availability of this *Release Notification Form & Permanent Solution Statement*. A copy of each of these notification letters is attached to this report as Appendix C. No environmental samples associated with RTN 3-33439 have been collected at any property on behalf of someone other than the owner.

## 10.0 LSP EVALUATION OPINION SUMMARY

The LSP of Record for the Release is Mr. Scott Kraihanzel (LSP License No. 5738). It is the Opinion of the LSP that the requirements of a Permanent Solution with No Conditions specified in 310 CMR 40.1000 have been met. The certification of the Permanent Solution Statement and all

documents submitted with the Permanent Solution Statement as required by 310 CMR 40.0009 is located on *Permanent & Temporary Solution Statement* (BWSC-104) included in Appendix A.

## **FIGURES**

## **APPENDIX A**

### **BWSC Transmittal Forms**

## **APPENDIX B**

### **Waste Manifests**



## **APPENDIX C**

### **Public Notification Letters**

## **APPENDIX D**

### **Statement of Limitations**

